

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MIDDLESEX, SS.	CIVIL ACTION NO.
PREMIER CAPITAL, LLC,) 03-CV-12497-NG
)
Plaintiff,)
)
v.)
)
BEVERLY JOHNSON PENZELL, d/b/a)
Law Office of Kris E. Penzell)
and BEVERLY JOHNSON PENZELL, as)
Personal Representative of the)
Estate of Kris E. Penzell,)
)
Defendants.)

JOINT FILING RE PROPOSED SCHEDULING ORDER
RESPECTING REMAINING DISCOVERY AND DISPOSITIVE MOTIONS

The plaintiff and defendant-in-counterclaim, Premier Capital, LLC ("Premier"), the defendant Beverly Johnson Penzell, as Personal Representative of the Estate of Kris E. Penzell, and defendant and plaintiff-in-counterclaim Beverly Johnson Penzell, d/b/a Law Office of Kris E. Penzell (collectively, "Penzell"), make this joint filing respecting proposed deadlines for completion of discovery and the filing of dispositive motions, pursuant to the direction of Magistrate Judge Collings.

Premier and Penzell have not reached agreement respecting such deadlines, and accordingly, respectively propose as follows:

Premier: Discovery (including expert-related discovery) to close on September 30, 2007; dispositive motions, if any, to be filed on or before October 31, 2007.

Penzell: Discovery (including expert-related discovery) to close on April 30, 2007; dispositive motions, if any, to be filed on or before May 31, 2007.

PREMIER CAPITAL, LLC

By its attorney,

Thomas James Morrissey /ks
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BEVERLY JOHNSON PENZELL,
As Personal Representative
of the Estate of Kris E.
Penzell; BEVERLY JOHNSON
PENZELL, d/b/a Law Office
Of Kris E. Penzell

By her attorneys,
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For the Counterclaim:

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Dated: December 4, 2006